double patenting as being unpatentable over claims 1-16 of USPN 6,044,415 (Futral). This

rejection is respectfully traversed, and reconsideration is requested.

Claims 1-26 each include, either directly or indirectly, the feature of associating a file

name with an identifier at a client, and sending both to a server. By way of contrast,

conventional systems have the client send a request to a server, the server associates an identifier

with the file name, and sends the identifier back to the client to process subsequent file requests.

Specification, Page 4: Line 15 to Page 5: Line 12. The embodiments provide at least two

advantages. First, the client may begin processing subsequent file requests since the identifier is

known to the client. Second, bandwidth use may be reduced since the server does not need to

send the identifier to the client. Specification, Page 5: Line 13 to Page 6: Line 15. At least this

feature is not disclosed by the references cited in the Office Action, either alone or in

combination.

Applicant submits that claims 1-26 are patentably distinct from claims 1-16 of Futral.

The Office Action states that Futral describes communicating a virtual address between a client

and a server. Futral describes a technique where multiple processes may access an I/O device

within an I/O Processor (IOP) in a controlled and secure manner. Futral, Col. 2, Lines 23-27.

Futral does not discuss communicating a virtual address in any context, let alone as a file name

or identifier. Although Futral does mention that "[e]ach IOP has its own virtual address space,"

Futral does not discuss the use of this virtual address space for any application. Futral, Col. 5,

Lines 53-54. Further, the Office Action states that "[i]t is well known in the art, that the claimed

file name and identifier will be mapped into unique numeric virtual address at Internet Protocol

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(IP) level of a standard network OSI model." Office Action, Page 3, Section 5. The IP level

does not convert a file name or identifier into a virtual address. Rather, the IP level may

encapsulate information and send it using a destination IP address, which is unrelated to the

embodiments. Applicants respectfully request withdrawal of this rejection.

Claims 1-2, 4-5, 9, 11-14, 16-23 and 25-26 stand rejected under 35 U.S.C. 102(e) as

being anticipated by USPN 6,442,548 (Balabine). This rejection is respectfully traversed, and

reconsideration is requested.

Balabine is directed to communicating information between a database-unaware

application and a database. According to Balabine, "[w]hen the application seeks to access

information in the database, a component of the IXFS system translates the file system request

into a database query format that is understandable by the database." Balabine, Col. 5, Lines 23-

30. An example of the component is called an "extension module." Prior to operation, the IXFS

system maps all the elements of a database to a namespace identifier, such as "x:". If the IXFS

system receives a file system request with the namespace identifier, it sends it to the extension

module. The extension module formulates a database query such as an SQL query to retrieve the

database element, and sends it to the database. The database then returns the requested element.

Applicant submits that claims 1-2, 4-5, 9, 11-14, 16-23 and 25-26 are not anticipated by

Balabine. As demonstrated previously, the IXFS system does not associate an identifier to a file

name, and then send the identifier and the file name to a server, as recited in the claimed

embodiments. Even if we were to assume for the sake of argument that the application was the

client, and the database was the server, the IXFS system assigns the namespace identifier and not

the application. If we were to assume for the sake of argument that the IXFX system was the client, the IXFS namespace identifier identifies the entire database and not a specific database element. Further, there would be no need for the IXFS system to send the identifier to the database since it is used to identify the entire database, and the database does not need an identifier for itself to process the request. Applicants respectfully request withdrawal of this rejection.

Claims 3, 6-8, 10 and 15 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Balabine in view of USPN 5,619,690 (Matsumani). Further, Claim 24 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Balabine in view of Matsumani, and further in view of Applicant Admitted Prior Art (AAPA). These rejections are respectfully traversed, and reconsideration is requested.

Balabine fails to disclose the features of the claimed embodiments as discussed previously. Therefore, the combination of Balabine with Matsumani and the AAPA would also fail to disclose the features of the claimed embodiments for similar reasons, as well as others. For example, even if the three references disclosed all the features of the claimed embodiments, which Applicant asserts they do not, there is no teaching to combine these three references. Further, the mere fact that three references are needed is evidence of the complexity of the claimed embodiments, and hence non-obviousness. Integrating the disclosed features of two systems would be difficult, and each added reference would increase this level of difficulty to the level of undue experimentation. Applicants respectfully request withdrawal of these rejections.

It is believed that claims 1-26 are in allowable form. Accordingly, a Notice of Allowance

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to this effect is earnestly solicited.

The Examiner is invited to contact the undersigned at 724-933-3387 to discuss any

matter concerning this application.

The Office is hereby authorized to charge any additional fees or credit any overpayments

under 37 C.F.R. § 1.16 or § 1.17 to Deposit Account No. 02-2666.

Respectfully submitted,

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John F. Kacvinsky, Reg. No. 40,040

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Deborah Higham   Date

Dated: May 30, 2003

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